

From: [Jessica Blome](#)
To: [Crusham, Joseph \(ENRD\)](#)
Cc: [Brockner, Peter \(ENRD\)](#); [Rae Lovko](#); [Brent Resh](#); [Danielle Holt](#)
Subject: Re: [EXTERNAL] Antelope - Motion for Partial Dismissal
Date: Tuesday, October 1, 2024 1:22:03 PM

Ok, that works as well. Thanks, Joseph.

Jessica

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On Oct 1, 2024, at 10:11 AM, Crusham, Joseph (ENRD)
<Joseph.Crusham@usdoj.gov> wrote:

Hi Jessica,

Thanks for reaching out. We do not want to have to refile our motion, so I think the cleanest path forward is for you to just concede this issue in your opposition.

Thanks,
Joseph

From: Jessica Blome <jblome@greenfirelaw.com>
Sent: Monday, September 30, 2024 9:53 PM
To: Crusham, Joseph (ENRD) <Joseph.Crusham@usdoj.gov>; Brockner, Peter (ENRD) <Peter.Brockner@usdoj.gov>
Cc: Rae Lovko <rlovko@greenfirelaw.com>; Brent Resh <brent@brentreshlaw.com>;

Danielle Holt <Danielle@brentreshlaw.com>

Subject: [EXTERNAL] Antelope - Motion for Partial Dismissal

Hi Joseph,

I just had a chance to review your partial motion to dismiss, and I agree with your section section. We did not remove all references to § 1983/damages and humane handling as directed. I propose that we file a fourth amended complaint removing the provisions that are struck and highlighted in the attached. You can then refile your partial motion to dismiss the writ claims, so we don't have to argue about something we did in error. Would that work for you?

Jessica

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